

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	2:21-cr-089
	:	JUDGE MORRISON
v.	:	
	:	
JAMES V. BARLOW,	:	
	:	
Defendant.	:	

**UNITED STATES’ REPLY TO DEFENDANT JAMES BARLOW’S RESPONSE
TO THE UNITED STATES’ MOTION FOR A PRELIMINARY ORDER OF
FORFEITURE**

The United States hereby respectfully replies to Defendant James V. Barlow’s Response to the United States’ Motion for a Preliminary Order of Forfeiture (Doc. 175).

Memorandum

The United States is seeking entry of a Preliminary Order of Forfeiture in this case ordering Defendant James V. Barlow to forfeit all of his right, title, and interest in assorted property that is more particularly described in the United States’ Motion for a Preliminary Order of Forfeiture (Doc. 172). Defendant James V. Barlow has filed a Response asserting that the Court should exclude certain items from its Preliminary Order of Forfeiture — the Real Property described therein as well as assorted cryptocurrency — because the items were acquired using cryptocurrency that was acquired or mined prior to his illegal activity and/or that the property belongs to a third party. (*See Response to United States’ Motion*, Doc. 175.) The United States respectfully asserts that the Court should enter the proposed Preliminary Order of Forfeiture without removing any of the identified property for the following reasons: (a) the record in this case demonstrates that the property identified by Defendant Barlow in his Response in opposition

is property that facilitated his illegal activity and/or was involved in his money laundering conspiracy, or is traceable to and comingled with such property, and is therefore subject to forfeiture to the United States; and (b) as provided by Rule 32.2 of the Federal Rules of Criminal Procedure, “[t]he court must enter the [preliminary] order without regard to any third party’s interest in the property.”

A. Because the property identified in the proposed Preliminary Order of Forfeiture was involved in and/or facilitated the illegal activity to which Defendant James V. Barlow has pleaded guilty, such property is forfeitable to the United States under 18 U.S.C. § 982(a)(1) and/or 21 U.S.C. § 853(a)(2).

The government may have multiple theories of forfeiture based upon the underlying crimes committed by a defendant. In this case — based upon the investigation in this matter and Defendant James V. Barlow’s admissions — it has been established that Defendant Barlow participated in a large drug trafficking conspiracy, a violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(C) and 846. (*See* Plea Agreement, Doc. 72.) Defendant Barlow accepted payments, and would pay his employee co-conspirators, in cryptocurrency. (*Id.* at PAGEID #: 419.) It has also been established that in an effort to conceal the proceeds and payments from this drug trafficking conspiracy, and to promote the continuation of the drug trafficking enterprise, Defendant Barlow conspired to launder these proceeds and payments using cryptocurrency mixing services “... designed to obfuscate the true nature, origin, and source, of such funds ...”, a violation of 18 U.S.C. § 1956(h). (*Id.* at PAGEID #: 419.)

As outlined in the United States’ Motion for a Preliminary Order of Forfeiture (Doc. 172), these violations support the forfeiture of property as provided in 18 U.S.C. § 982(a)(1) and 21 U.S.C. § 853(a)(1) and (2).

There is no question that Defendant James V. Barlow obtained proceeds, directly or indirectly, as a result of his violations of 21 U.S.C. §§ 841 and 846 and that such proceeds are

subject to forfeiture in this case under 21 U.S.C. § 853(a)(1). Defendant Barlow's objection to the forfeiture of a portion of the property described in the United States' Motion for a Preliminary Order of Forfeiture instead relies on an assertion that some of these assets could have been, or were, acquired before the formation of his drug trafficking organization and resulting illegal activity meaning they are not proceeds derived from his illegal activity.

In the Statement of Facts of his plea agreement, Defendant Barlow admitted:

Over the course of the drug conspiracy, in an effort to conceal the proceeds of this activity and promote the continuation of the drug enterprise, JAMES V. BARLOW would accept payments and pay his employees in crypto currency, including in Bitcoin, Ethereum, and Monero. JAMES V. BARLOW would take extensive efforts to conceal these proceeds and payments, including sending the cryptocurrency to mixing services such as Wasabi Wallet, SharedCoin, and Bestmixer, which are services designed to obfuscate the true nature, origin, and source, of such funds. Once the transactions had been tumbled or mixed in a fashion to conceal that they were funds gained through drug transactions on the dark web market vending site, BARLOW then would have the funds sent to legitimate exchanges...

(Plea Agreement, Attachment A, Doc. 72 at PAGEID #: 419.)

In Exhibit B to his Response, Defendant Barlow succinctly details how he obtained his initial 938 coins of Bitcoin and how he put that cryptocurrency to work, describing as follows:

Mr James BARLOW bought his first Bitcoin(s) in December 2012. He continued to buy/sell cryptocurrencies for a year and a half before the August 2014 starting what grew into the Drug Trafficking Organization (DTO) known as 'TripWithScience' and later also 'PerfectShrooms.'

(Response to United States' Motion, Doc. 175 at PAGEID #: 1177.)

It is and has always been the United States theory of the case that Defendant Barlow utilized cryptocurrency he purchased prior to 2014 to start the dark web drug trafficking sites known as "TripWithScience" and "PerfectShrooms" and over the course of the next seven years, comingled that cryptocurrency with other funds and cryptocurrencies to fund the continued operation of these drug trafficking and money laundering enterprises. The evidence in this case, as well as the

Statement of Facts in support of the Plea Agreement, established that Defendant Barlow used his commingled funds in support of his dark web market sites. The expenses incurred in operating these dark web market sites included, but was not limited to, the purchase of manufacturing equipment, precursor chemicals, mailing supplies, packaging materials, computers, internet services, one or more residences to conceal the manufacturing of the controlled substances, vehicles to utilize to move the packages of drugs to mail delivery services, fuel, travel to facilitate the conspiracy, and payments to his employees.

The law is well-settled that the commingling of fraud proceeds with untainted money as part of concealment money laundering under 18 U.S.C. § 1956(a)(1)(B)(i) permits the forfeiture of the untainted money. (*United States v. Puche*, 350 F.3d 1137, 1153 (11th Cir. 2003).) “Forfeiture of commingled funds . . . is proper when the government demonstrates that the defendant pooled the funds to facilitate or disguise his illegal scheme.” (*Id.*) Commingling “is enough to expose the legitimate funds to forfeiture, if the commingling was done for the purpose of concealing the nature or source of the tainted funds (that is, if the commingling was done to facilitate money laundering in violation of 18 U.S.C. § 1956(a)(1)(B)(i).” (*United States v. Coffman*, 574 F. App'x 541, 561 (6th Cir. 2014) (internal quotation marks and citations omitted).)

The evidence is thus clear that Defendant James V. Barlow used cryptocurrency he had acquired prior to 2014, as well as proceeds he earned during the conspiracy to fund the operation of the dark web market sites and to pay his employees from 2014 to 2021. Defendant Barlow’s Response fully supports the United States’ theory of the case when he explains that after acquiring Bitcoin from 2012-2014, the “150 (Bitcoin) were left unspent/unsold by January 2021.” (*See Doc. 175 at PAGEID #: 1185.*) The clear implication of starting with 900+ Bitcoin, and ending up with 150 Bitcoin, is that Defendant Barlow spent or used more than 700 Bitcoin in the operation of the

drug trafficking organization he established in 2014 and controlled and operated until April of 2021.

The shell-game Defendant Barlow is now attempting to play is made evident by examining the example of the 150 Bitcoin expenditure he identifies. (*See* Doc. 175 at PAGEID #: 1185-1188.). Defendant Barlow explains that beginning in January of 2021, he utilized 150 “unspent” Bitcoin to secure a loan via a cryptocurrency “Smart Contract” which he leveraged to take out \$3 million dollars in loans to fuel the purchase of property, additional cryptocurrency including ADA and DAI. (*Id.*). According to Defendant Barlow, these Bitcoin are separate from his drug trafficking and money laundering conspiracies. What the defendant leaves out about the exact origin of these Bitcoin and path that these 150 Bitcoin took to end up in his Coinbase account, is illuminating.

The 150 Bitcoins that Defendant James V. Barlow identifies in his Response were being stored in one his Electrum Wallet. Tracing and additional investigation established that over the pendency of the conspiracy, Defendant Barlow’s Electrum wallet both indirectly received approximately 40.9 Bitcoin from Darknet Marketplaces, to include: 29.425 Bitcoin from AlphaBay, 5.13 Bitcoin from TradeRoute Market, 2.65 BITCOIN from Silk Road and 2.5 BITCOIN from Nucleus Market. BARLOW’s Electrum Wallet also received approximately 307.9 Bitcoin from Mixer services to include 240 Bitcoin from SharedCoin, 47 Bitcoin from BitMixer.io and 14 Bitcoin from Bitcoin Fog.

In short, this wallet consistently received illicit funds from Defendant Barlow’s criminal activities. From this Electrum wallet, in January of 2021, Defendant Barlow took the 150 Bitcoin from the comingled funds and sent 150 Bitcoin from his wallet to the Binance account of his personal assistant in the Philippines, Lea Andrade Vilorio, a wallet that he controlled at the time.

(Exhibit B). He then used Ms. Viloría's Binance account to convert the Bitcoin into "Wrapped" Bitcoin, which he used to enter into a Smart Contract with Oasis.app and convert the majority of the Bitcoin into DAI that went into his personal Coinbase account, from which he purchased the property referenced in his Response.

Thus, even the example that Defendant Barlow identifies as being an "innocent" use of the "separate" Bitcoin he previously owned, demonstrates that these were funds that were comingled with his drug trafficking profits and proceeds, occurred during the time frame when he was operating a dark web drug trafficking and money laundering conspiracy, and exemplifies the extensive efforts he took such as using cryptocurrency mixers and the use of a third-party account to conceal the source and ownership of the of the cryptocurrency. Standing alone, this comingling provides a proper basis for the forfeiture all of the items identified in the United States' *Motion for a Preliminary Order of Forfeiture and Attachment C of the Plea Agreement*.

As such, even if it is difficult to determine whether the cryptocurrency, the wallets, and/or the Real Property that Defendant Barlow requests be returned to him — or omitted from the forfeiture order (*see* Barlow's Response, Doc. 175 at PAGEID #: 1168) — are directly traceable proceeds derived from the drug conspiracy, the United States asserts that the forfeiture of these items is entirely appropriate in this case because the United States advanced more than a simple proceeds theory of forfeiture in this case. Indeed, the United States asserts that the cryptocurrency, wallets, and Real Property are also subject to forfeiture in this case because they were all comingled with Defendant Barlow's assets, facilitated and/or were involved in Defendant Barlow's illegal activity and are therefore subject to forfeiture under 18 U.S.C. § 982(a) as property, real or personal, involved in Defendant Barlow's violation of 18 U.S.C. § 1956(h), or any property traceable to such property, and/or under 21 U.S.C. § 853(a)(2) as property that was

used, or was intended to be used, in any manner or part, to commit, or to facilitate the commission of the illegal drug activity and money laundering to which Defendant James V. Barlow has agreed to plead guilty to.

B. Because Rule 32.2 of the Federal Rules of Criminal Procedure provides that a third parties interest in property subject to forfeiture in a criminal case is resolved after a preliminary forfeiture order is entered, Defendant Barlow cannot object to the inclusion of property in a preliminary forfeiture order based upon an assertion that the property actually belongs to a third party.

In his Response, Defendant James V. Barlow objects to the inclusion of certain cryptocurrency and/or wallets because third parties may have an interest in the property. (*See* Doc. 175 at PAGEID #: 1169.) In fact, he asserts that his friends and family “decided to invest in [his] cryptocurrency portfolio and authorized [him] to handle the investment choices on their behalf, like a hedge fund manager. (*Id.*)

As an initial matter, the United States notes that it is not aware that Defendant James V. Barlow holds any licenses or has registered any businesses that would allow him to operate a money transmitting business. Title 18, United States Code, Section 1960 provides, “Whoever knowingly conducts, controls, manages, supervises, directs, or owns all or part of an unlicensed money transmitting business, shall be [guilty of a crime].” 18 U.S.C. § 1960(a). The term “unlicensed money transmitting business” is defined as “a money transmitting business which affects interstate or foreign commerce in any manner or degree and . . . fails to comply with the money transmitting business registration requirements under section 5330 of Title 31, United States Code, or regulations prescribed under such section . . .” 18 U.S.C. § 1960(b)(1)(B). “Money transmitting business” is defined as “any business . . . which . . . provides check cashing, currency exchange, or money transmitting or remittance services . . . or any other person who engages as a business in the transmission of funds, including any person who engages as a business in an

informal money transfer system” 31 U.S.C. § 5330(d)(1)(A). “[T]he term ‘money transmitting’ includes transferring funds on behalf of the public by any and all means including but not limited to transfers within this country or to locations abroad by wire, check, draft, facsimile, or courier” 18 U.S.C. § 1960(b)(2). According to FinCEN’s Guidance, “exchangers” of virtual currency are “money transmitters” that are required to register with FinCEN. (*See* Application of FinCEN’s Regulations to Persons Administering, Exchanging, or Using Virtual Currencies, FIN-2013-G001, at 3 (Mar. 18, 2013). “An ‘exchanger’ is a person engaged as a business in the exchange of virtual currency for real currency, funds, or other virtual currency.” (*Id.* at 2.)

Notwithstanding Defendant’s Barlow’s assertion that a portion of the property identified in this case may have been involved in an illegal money services business, the United States focuses on the purpose related to the instant Reply — the entry of a Preliminary Order of Forfeiture in this case as provided by Rule 32.2 of the Federal Rules of Criminal Procedure based upon Defendant James V. Barlow’s violations of 18 U.S.C. § 1956(h) and 21 U.S.C. §§ 841 and 846. In accordance with Rule 32.2, the United States is seeking entry of a Preliminary Order of Forfeiture in this case that orders Defendant James V. Barlow to forfeit his right, title, and interest in the property identified therein.

Rule 32.2 of the Federal Rules of Criminal Procedure provides that “[t]he court must enter the [preliminary] order without regard to any third party’s interest in the property. Determining whether a third party has such an interest must be deferred until any third party files a claim in an ancillary proceeding under Rule 32.2(c).” Fed. R. Crim. P. 32.2(b)(2)(A). “Under this rule: the court orders the forfeiture of the defendant’s interest in the property — whatever that interest may be — in the criminal case. At that point, the court conducts a separate proceeding in which all

potential third party claimants are given an opportunity to challenge the forfeiture by asserting a superior interest in the property.” (*United States v. Kingston*, No. 2:18-CR-00365-JNP, 2022 WL 16948816, at *5 (D. Utah Nov. 15, 2022) citing Fed. R. Crim. P. 32.2, Advisory Committee Notes.) “Accordingly, any objection the defendant may have on the basis that a third party holds an interest in forfeitable property is not his objection to make. Thus, the court’s only task is to determine whether the government has proven that the specific properties that it seeks to forfeit’ are traceable to [the defendant’s] convictions.” (*Id.*)

In addition, the Title 21, United States Code, Section 853(k) expressly bars intervention by a third-party in the forfeiture process outside of the ancillary hearing process provided in 21 U.S.C. § 853(n). Section 853(k) provides:

(k) Bar on intervention

Except as provided in subsection (n), no party claiming an interest in property subject to forfeiture under this section may—

- (1) intervene in a trial or appeal of a criminal case involving the forfeiture of such property under this section; or
- (2) commence an action at law or equity against the United States concerning the validity of his alleged interest in the property subsequent to the filing of an indictment or information alleging that the property is subject to forfeiture under this section.

(21 U.S.C. § 853(k).) Thus, as the Sixth Circuit has explained, “[a] third party’s only avenue for protecting [her] interest [in forfeited property] is the procedure set forth in 21 U.S.C. § 853(n)” — commonly known as the “ancillary proceeding.” (*Brown v. United States*, 692 F.3d 550, 552 (6th Cir. 2012) (emphasis added); *see also United States v. Warshak*, No. 1:06-CR-111, 2009 WL 113232, at *3 (S.D. Ohio Jan. 14, 2009) (holding that third parties lacked standing to object to forfeiture; their only remedy was to file a claim in the ancillary proceeding or a remission petition with the Attorney General).)

Therefore, it is not appropriate for the defendant to object to the inclusion of property or intervene in the inclusion of property in the forfeiture order based upon a potential third parties interest. The United States notes that as part of its Motion it asserted that following entry of a forfeiture order in this case, it will provide written notice to any person who reasonably appears to be a potential claimant with standing to contest such forfeiture in the ancillary proceeding in accordance with Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure. (See Doc. 172 at PAGEID #: 1153.) Therefore, the United States requests that as part of the forfeiture process, Defendant James V. Barlow be ordered to provide the full name, telephone number, and last known address for any third party he asserts may have an interest in the cryptocurrency and/or wallets that are identified in any preliminary forfeiture order entered in this case.

C. Conclusion

Therefore, based upon the record of this case, the United States' Motion for a Preliminary Order of Forfeiture, and this Reply, the United States respectfully requests that the Court enter a Preliminary Order of Forfeiture in this case against Defendant James V. Barlow ordering him to forfeit all of his right, title, and interest in the following property to the United States in accordance with 18 U.S.C. § 982(a)(1) and 21 U.S.C. § 853(a)(1) and (2):

The following cryptocurrency seized from wallets owned by Defendant James V. Barlow:

Amount of Cryptocurrency	Wallet Address
0.07692270 BTC	3KmzJxFx6Nr7PYjsmqrPAUmThrT85Y6PR1
0.02113000 BTC	32juQXT6GzG3a3Knd6g9XDRFQvGsvxawwL
0.00357018 BTC	3Dj8GDvuqCgCJw4UgVBTbdWANrAH4eWC1C
0.06067440 BTC	bc1q6dcr4fwznz0gl9dxqv0p24qyuhfrfdgdr2qwtzvf
0.00116606 BTC	bc1qaaueygvk828v2wuz0a4zm4wvqsgmmmm92kfs30e
0.00336344 BTC	bc1qq3rn9tq7srg9lyh4sj2smpvl6gujnv8rzuf89
0.00346184 BTC	bc1qjxe8ffwa3jhulv5j0zkm7henx65qsagt9mksa6
0.00062355 BTC	bc1qppgq3h5wcdkh6t23wm5gyzrgs0m67vvu5yr8jg
0.00332544 BTC	bc1qqcr9z0cvlvtpdkect2qurv8nhrijfywljlf55nx
0.00196334 BTC	bc1q98k4hcxuqn8gsj3s7sske7lhatx54lkuyppqq5q
0.00187484 BTC	1P3rkdEd9miGaMKKHqBz9AwMYsWeL2sYmQ

0.02005223 BTC	15H59Aah7YKgjutbjeoam13zBeov4NJdMA
0.00048519 BTC	12DtSEoNJcse1RnUdCBZxKb8JcUrPVJ7ii
0.00059620 BTC	142mxNF4USPT4KKNoJYHUoHbKoEx7wDHA7
0.00345200 BTC	17QUsMjyjVira8Ac5Pyi1qJY5Z74UeVz1X
0.00010000 BTC	12DtSEoNJcse1RnUdCBZxKb8JcUrPVJ7ii
0.00051720 BTC	1L3CTJtbiThzk2dwfnynWLAosxUESUaVKN
0.00177230 BTC	1GgGbux5wLdcQ7x98qvsajv36NA9s45AH4
0.00356930 BTC	1C64hPBS8iQiKPTjd49VHCWopW3afATvXg
0.00080487 BTC	1EJJSa7tdASq2ssgb32kpx6FPYCeQrJRRt
0.00186410 BTC	1Nhvnqs34kH46SsVPfcUyjbXhK6x9297v
0.00183300 BTC	1ABfFfyiJAJeuUftPVfv4xJsuG8eJ8NJgE
0.00132820 BTC	14G865mrp2aWvDjTPQYcNT8cr3MvYTPox
0.00001852 BTC	1Js12zpjNP995GVDv2CSJ7JH4SFZhXyTey
0.00125840 BTC	1NgUcizPtfEB95BhwGZXzc4mwJw4v13kkb
0.00077650 BTC	167WQvDpgFRMuZGMiqnaHTE8FzriCBNYxU
0.00071164 BTC	bc1q80r4zwzzlu7q8tnka8jwhn3va8r0rs2mewezr2
0.00289894 BTC	bc1qs768c0gfsq0733dmq2yc3zeuzm4flkn643qtsy
0.01000000 BCH	qpku9tw38e0auhpq24hd6wa4dkdc7des2st7x3cp22
9.08934853 BCH	qq4tel9y43t4kkm3yvjhcaveeuxquaxvycpk9dstlm
0.34565245 BCH	qzzkm24cj77yfsjdgq5hn02n07algz2yevt6txymfr
1.99999771 BCH	qqqkeps6yflhr0vhtjtn0zgs4fff4y9n3fvc4w9ledn
9.30199771 BCH	qpmvayjhla8smd7z7lqw0x50mmak68dm0vzwq8at7u
2.824863 ADA	addr1qxugkkmeqkv4w6sefp2dqyaj3ynk5j9zexeuf675akenkr9mdl vxush90g7nqnznzv6z6auw2tnyymglygj7d8v0aves4xcfuw
15 ADA	addr1qytdq20006dvmfyps2gc2zswd34ka47jfv83ud6p9zj5ahzamdlv xush90g7nqnznzv6z6auw2tnyymglygj7d8v0aves4e4ph8
449981.826359 ADA	addr1qxns73wmt0mnzyqwzu5673fz8q3708aa5qs40f7vqaa8c99mdl vxush90g7nqnznzv6z6auw2tnyymglygj7d8v0avespkvcdf
20639.2 ADA	addr1q9dmn3sh6ge44sh730wye9ucvyuxqzgzq620v82pzxl9n84mdl vxush90g7nqnznzv6z6auw2tnyymglygj7d8v0avesgjs9w
245362.39218 ADA	addr1qxzgr58dczumhgcmmwv5gc2lc9tyx2a2l3aym0t9ezc729mdl vxush90g7nqnznzv6z6auw2tnyymglygj7d8v0aveshy8j99
3033.687717 ADA	stake1uxaklkrwtgh50fsf3f3xdpdw7899ejzd50jyf0xnk87kvc8yf97c
512.288229 ADA	addr1q97qzext0uhv8dtjhxwgh6negygfc0xjqajs trrysnpymmmtuq9 jvklewcw6h9wvu3048jsgsns7dypm9qkxxfpzxhfksy8utrs
283998.826359 ADA	addr1q9qnwh8lnljp3px6xglurlrmusk5yuf8sd29242k7hekkx9mdlvxus h90g7nqnznzv6z6auw2tnyymglygj7d8v0avesypvlhq
0.283313073777777777 ETH	0xe5ca01ff7e98cd7bf209895a2de04aad22cb96ab7a5dfdc61fc0ac4 f7aa80911
0.927160225 ETH	0x748589b0eb2713ef5a940764ba2343a66b7603443056fd2f15f47b 4b33cdc993
22.176731417442724858 ETH	0xebae34414a6f3664fb49bf6ed86d4e86a26092151bc889b9af592 b6
0.298443892 ETH	0x4fbfd98a72553023d789137ba0b248be5f0ed06a855fb4f2a7a4a3
0.92960739 ETH	0xfe7fe5931b71df73ce363833fde43635bd0d95c0
0.000861 ETH	0xe1acacb024e2553e21fbf20d94ca45f7113c4154
0.91633964 ETH	0xe1acacb024e2553e21fbf20d94ca45f7113c4154
0.41636360 LTC	ltc1q5yauk3j22tj8wnmu40km4ufzkg5eknfs7e4y2z
0.58600860 LTC	ltc1qc23uggydqqgac2pxtxwgh3v2m7qf2nw5z46ccw

0.34487135 LTC	ltclqfrpa27vzvft43vnqgerypr7eh4sgm7khfecd0
0.56006237 LTC	ltclqwxcgpvvf5p8vn33x87hzgcwyheaqv9rf0ngx
0.88459934 LTC	ltclq35tlhkuagmnjel4c65wszepusf29my4j737u6r
0.91952218 LTC	ltclqj8lu49jumhd2wmg5sza6tdgcrgek84qtwr7uyu
0.56227148 LTC	ltclq9xfxyu709ew8xah7da2wxjlsv2y2ksuqghwdven
0.33931910 LTC	ltclq9sxqy0hzwuc8nzsm2kqfdhqxx5xj2y6agfmyg
0.37162809 LTC	ltclqdwxf0f2vpsrp099eq3sv36lphp4w9rgs9a8gwh5
0.19583067 LTC	ltclqum73j3esjp7khrgluutn24kh07fxhth8ey09nl
1.10739813 LTC	ltclquyuwju5dv7s2ujul857vq4nnazd0a2qh9qmk8
0.36320907 LTC	ltclqxyxnh02asu2f9wgs123gcjk7706y57pt0mwmgd
0.41826473 LTC	ltclqyv6awpzqfy7afsu4pcqvrw6h3u5rmq9n5kz5
0.27204643 LTC	ltclqw0qerta9phmeuj99pvc9ngw7eycnrdhplukp7t
1.09294355 LTC	ltclq6c032lummk8vpe0hlzvdugtm7kqrhvtepx3a2f
0.20045406 LTC	ltclq6rtx9p0t678ekkw13qd0xajg2kmqe0awz0zzq
0.75388269 LTC	ltclq2tmf9213d5ptwggw9hl0cuevf3rjs0fj3er807t
0.20014188 LTC	ltclqz08ay050q4rguuw2j75zuscgmjgt7agw7y4uw
0.33779804 LTC	ltclqd8naj5h0g72e5lpgfh62j9pjhxqu5g8x3ty3rx
1.04211985 LTC	ltclqgtp82lvwd0676d44rf2rrhur98l9cvzuegd0hp
1.67961317 LTC	ltclq8pkq3sztmn3k58vhkf8ndlf95prg3ytupx0zew
0.44415705 LTC	ltclqrjcpvp6uqtj3jnt6a4m8jqdswe5dpmlfamm8kq
0.42798064 LTC	ltclqz5a040qkf70h48m6n2l5dsawf3t3gx4sy5jhlx
0.65296509 LTC	ltclqttd2sg78kn3p94c7mwp8slesn40d8s9ndfd32l
1.05977784 LTC	ltclq26318akejwtdv6fr5ugjyxqq85v5xq6eee8ksc
0.45100106 LTC	ltclqyv6zg2hln8xz5n9smqyvgyezgyswqpeazc4t8
0.70967696 LTC	ltclqpdazpxts9kaj7y52y5kp77wzp8g3q5nkky4yue
1.00104407 LTC	ltclqwayekytufqysj93h3z0pjl7eug667nh8kkga8
0.92026856 LTC	ltclq8j9rxsvprp0q77apgvw3kf9rv58p9a93qhk8he
0.24489698 LTC	ltclqn5vjh224th4nx45r0gsakssxxlhwnkrpq7wvrm
2.28616509 LTC	ltclqtrk02aty95tqxfsfxyqny2k9r4gguvgetjn0
0.53705138 LTC	ltclq9cvl42lsdm99v3r4k4hrkrpwwd0zz2fjlnxx78
0.52888303 LTC	ltclqqjzx7s33jgpwxpert8xncsmg0w4fjvu65dtge
0.37458894 LTC	ltclq28nhpn97xy5p53ly0ptsdq2tzu8kr349w5akks
0.36083423 LTC	ltclqv3ks4w2xznvztw26e56tk9etjpv18qvf5jz2s4q
0.47531830 LTC	ltclq5kcw0ph3rpcfgwkju57g5avd792y34pdj9g6rz
2.45368155 LTC	ltclq2mvl9wz0hagqrrsky3aksu0egaf4k6e38jge4m
0.1620682 LTC	ltclq5std222ltu36ptmehzgp89xpg7knarrgpc36ul
3.42672983 LTC	ltclqjn3wlddgnl9kr70v3xmyryqja9pa70lqqqfxe
0.70468502 LTC	ltclqvkd4z7lq2vjuaal2hjt0vagdnclgekx34lzhn
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0.104089459715 XMR	432RhANooCZYtN3EaQGv434ynQDFA9oMr28ifx4ucjuEQBRJ kAdLmX8CBL6X8iWXZCRs3b1Bs9iWFKiT6k265DtNC7agg37
18.958526601531 XMR	89LZ3Kzp36rfcBPdG73CxkeppTYBVT5QKApyksQdWdzydE8QH kdjwAY8wEs9yys8Hy4vjLVld1uRtSsb1DjZBwSE2dk1rrZ
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0.00572822 XMR	47jZE6Juw1HdRdXgQLGPauCL9zhDhTA9V2F2HfFM1nMNic7yzh R46mWNx5sJsa8eG5P61gPkqp1t7lougU8SBbKJkAUa3
37.29144 XTZ	tz1Pww3GvWpkSeFkzRv2oraLRXM2p9nswjKd
46563.65 BAN	Ban_1upsn4y64uif9ezdez1164mmmkeqqczrzywy8i9ondryg35o3so fxr5wa8j
236.40 BAN	ban_3omsjwctouwddhmf057x6knwqnuuwy6 oqnrhoo6rawjbaz n6w5twypsiwq
175.13911699 BNB	bnb1rfd2yr3wf3xqmqdj5cyskhq0vuhge727kdj527
40282.57914443 HBAR	0.0.85269
10.80637082 NANO	Nano_1ra33yydpdkgny4axr7yk6pke8cm6dtf3wszkqab7akxu446 xpuikjs5mr3ak
74078.53500000 VET	0xf74AE4d2d2C2fA2eaF23b3CaE5633C0FA2f591e0
2348.83953368 VTHO	0xf74AE4d2d2C2fA2eaF23b3CaE5633C0FA2f591e0
11092.26641731 DOT	1EqBkL...jmmvbt

All cryptocurrency associated with Celsius User Defendant James (Jim) V. Barlow, User ID: 8f667480-4c3b-4c76-8afe-09dfa37695c3, to include, but not limited to, the following wallet addresses:

- 3Dj8GDvuqCgCJw4UgVBTbdWAnrAH4eWC1C;
- bc1qc2z7g87rep4m35lmzzvq9vuyn5ym3gac5nmly0;
- ltc1qm9pcmvk8dd9gzgmgzm00tgrpv0yavzsg06pnmr; and
- 0x3F2CF9915e0960226C0dd685Dbe3a1FB17A7Cc1e.

A 2016 Tesla Model X- Wagon, VIN 5YJXCDE45GF026419;

A total of approximately \$687,915.54 in United States currency seized from Wealthfront Brokerage LLC, My Personal Investment Account Individual Investment Account xxx5396 held in the name of Defendant James V. Barlow; and

The Real Property known and numbered as 13100 Cameron Drive, Brighton, Adams County, Colorado with all improvements, appurtenances, and attachments thereon, Record Owner: Barlow Family Limited Partnership, a Colorado limited partnership, and legal described as:

County of Adams, State of Colorado, described as follows:

SECT, TWN, RNG: 28-1-66 DESC: FRACTION W2 SEC LYING
N OF BURLINGTON DT AND S AND E OF ROW OF C B AND
Q RR AND W OF OUTER TOE OF BARR LAKE

EMBANKMENT EXC ROW AND EXC HWY, COUNTY OF
ADAMS, STATE OF COLORADO.

NOTE: LEGAL DESCRIPTION SUBJECT TO CHANGE UPON
COMPLIANCE WITH REQUIREMENT NO. 11

Also known by street and number as: 13100 Cameron Drive,
Brighton, CO 80603
Last Conveyance Recorded at Reception No. 2021000027359 –
Records of the Recorder of Adams County, Colorado.
Parcel Number: 0156928000007.

Respectfully submitted,

KENNETH L. PARKER
United States Attorney

s/Michael J. Hunter
MICHAEL J. HUNTER (0076815)
Assistant United States Attorney
Attorney for Plaintiff
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
(614) 469-5715
Michael.Hunter@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify on this 2nd day of December 2022, the foregoing Reply to Defendant James V. Barlow's Response to the United States' Motion of the United States for a Preliminary Order of Forfeiture was filed and served on all attorneys of record using the Court's CM/ECF system.

s/Michael J. Hunter

MICHAEL J. HUNTER (0076815)
Assistant United States Attorney